

REMARKS

The application is believed to be in condition for allowance because the claims are novel and non-obvious over the cited art. The following paragraphs provide the justification for these beliefs. In view of the following reasoning for allowance, the applicants hereby respectfully request further examination and reconsideration of the subject application.

The 35 USC 103 Rejection of 1, 2, 9-12, 14-17, 19-21 and 55-61.

Claims 1, 2, 9-12, 14-17, 19-21 and 55-61 were rejected under 35 USC 103(a) as being unpatentable over Konopka et al, U.S. Patent No. 5,850,250, herein after referred to as Konopka, in view of Taylor, U.S. Patent No. 7,113,201 (herein after Taylor). The Examiner stated that Konopka teaches the applicants' claimed invention, but does not teach that the server is not only capable of broadcasting the sub-events, but also of recording the captured sub-events. However, the Examiner further contended that Taylor teaches this feature, rendering the applicants' claimed invention obvious. The applicants respectfully traverse this contention of obviousness.

In order to deem the applicants' claimed invention unpatentable under 35 USC 103, a prima facie showing of obviousness must be made. To make a prima facie showing of obviousness, all of the claimed elements of an applicant's invention must be considered, especially when they are missing from the prior art. If a claimed element is not taught in the prior art and has advantages not appreciated by the prior art, then no prima facie case of obviousness exists. The Federal Circuit court has stated that it was error not to distinguish claims over a combination of prior art references where a material limitation in the claimed system and its purpose was not taught therein (*In Re Fine*, 837 F.2d 107, 5 USPQ2d 1596 (Fed. Cir. 1988)).

The applicants claim a Distributed Meeting (DM) system that provides high quality two-way conferencing and recording of meetings, as well as rich browsing of archived meetings enhanced through a number of analysis techniques. The system uses a variety of capture devices (360° omni-directional camera, whiteboard camera,

presenter view camera, remote view camera, microphone devices and arrays and a graphics capture device) to give a rich experience to local and remote meeting participants. These capture devices are all synchronized to provide an integrated, scalable system and method for two-way conferencing, broadcasting, recording and viewing meetings or other events. Archived meetings can be quickly viewed using speaker filtering, spatial indexing, time compression and a number of analysis tools. In general, the DM system and method not only records notes and drawings on the whiteboard, but also captures 360° video and audio. The DM system is designed to support remote viewing and participation in meetings as they occur and viewing of meetings after they have finished (Summary).

As discussed previously, the DM system and method can be used for broadcasting a meeting to one or more remote clients; recording a meeting; and browsing of a recording of a meeting. **The DM system has multiple cameras of different types that simultaneously capture different sub-events occurring in a space where an event occurs, such as a meeting room. The cameras can include a 360-degree camera centrally positioned to monitor in 360 degrees the space in which the event occurs; a remote view camera positioned so as to capture a view of event participants in the meeting room; a presenter view camera positioned so as to capture a view of the front of the meeting room where a presenter is typically presenting; and a whiteboard capture camera positioned so as to capture strokes written on a whiteboard. The cameras can be used in various combinations.** (Summary)

The DM system and method can also include a virtual director module that automatically switches between the aforementioned cameras of different types to display a meeting-appropriate view of a speaker or other meeting data. The view displayed can also be manually set by a user. (Summary)

In contrast, Konopka discloses a video distance learning system including a teaching classroom connected to remote learning classrooms by a fiber-optic communication network. The teaching classroom includes a rear audio/video cabinet housing four video monitors and a camera. The remote classrooms have front

cabinets with four monitors and a camera. In a normal operating mode, one of the video monitors will display the teacher, while the other three monitors display classroom images. A rear video camera mounted is focused on the teacher and a front video camera may be focused on the students. The front video cabinet may have a graphics or document camera is also provided on the front video cabinet. The document camera points downward at a light table to image materials such as books, pictures and overhead transparencies. The teacher may switch between the rear camera, the front camera and the document camera. A teacher's work station, may be located at the front of the teaching classroom. A control panel allows the teacher to control all devices located within the room, such as volume, displays, or focus. The work station may also include a personal computer interfacing with the network to schedule classes. The video distance learning system facilitates eye contact between the teacher in a teaching classroom and students in remote classrooms. **Konopka does not, however, teach the applicant's claimed virtual director that automatically determines which view of the multiple cameras of different types to display, and automatically switches between the multiple cameras of different types to display a view of one of the different sub-events.**

Granted, the Examiner states that the tilt and zoom control 113 of the front camera 113 is the same as a virtual director of the applicant's claimed invention **that automatically determines which view of the multiple cameras of different types to display, and automatically switches between the multiple cameras of different types to display a view of one of the different sub-events.** Per column 7, lines 4-26, the tilt and zoom control camera is not the same as the applicant's claimed virtual director. This passage states,

"A front video camera 111 is mounted within a top portion of the front audio/video cabinet 100 within the classroom for receiving a video image of students seated at student locations 400. The front camera 111 is completely enclosed and includes a robotic pan, tilt and zoom control system 113 which controls the direction in which the camera is aimed. The front camera 111 may be focused on either a wide view of the classroom or on an individual student. According to one embodiment, the teacher or a teacher's aide may control the aim and focus of the front camera 111 through a control panel 302 located at the teacher's workstation 300 or a handheld infrared remote controller 302A. According to alternative or optional feature, the front camera controller 113 may be voice activated to focus

in on a particular student who is speaking. Upon activation of one of the student microphones 13 at preset locations within the classroom, the front camera 111 either automatically, or through input from the control panel 302, aims at the microphone 13 into which the student is speaking. When the front camera 111 is actuated by activation of one of the microphones 13, the microphone gates on when a certain level of volume is applied. The gating of the microphone 13 activates the front camera control 113 which pans and focuses the camera into the field of vision for the person speaking.”

Clearly, the pan and tilt controller 113 only pans and zooms the front camera 111. It 113 does not select between different types of cameras to determine which camera to display. Clearly in Konopka the teacher, not the pan and tilt controller 113, manually picks the camera to display.

Taylor teaches an image processing apparatus where image data from a plurality of cameras capture the movements of a number of people, for example in a meeting, and sound data from a directional microphone array is processed by a computer processing apparatus to archive the data in a meeting archive database. **The image data captured is processed to determine the three-dimensional position and orientation of each person's head and to determine at whom each person is looking.** The sound data is processed to determine the direction from which the sound came. Processing is carried out to determine who is speaking by determining which person has his head in a position corresponding to the direction from which the sound came. Having determined which person is speaking, the personal speech recognition parameters for that person are selected and used to convert the sound data to text data. Image data to be archived is chosen by selecting the camera which best shows the speaking participant and the participant to whom he is speaking. Image data, sound data, text data and data defining at whom each person is looking is stored in the meeting archive database. (Abstract)

Taylor does not, however, teach the applicant's claimed multiple cameras of different types simultaneously capturing images of sub-events occurring in a space associated with an event. In Taylor all the cameras are of the same type positioned so as to determine the positions of the meeting participants. Nor does Taylor teach a virtual director that determines which view of the multiple cameras of different types to display, and automatically

switches between the multiple cameras of different types to display a view of one of the different sub-events. In Taylor only a far view of the speaking meeting participant and to whom they are speaking is recorded. Most of the people speaking will be captured from behind as is evidenced from the positions of the cameras relative to the majority of the meeting participants (see FIG. 1). No close up frontal views of a speaker can be displayed; no views specifically optimized to be transmitted to a remote participant can be displayed; and no whiteboard camera views can be displayed.

Since neither Konopka nor Taylor teaches the applicant's claimed **virtual director that determines which view of the multiple cameras of different types to display, and switches between the multiple cameras of different types to display a view of one of the different sub-events**, the combination does not teach it. Thus, the applicants have claimed elements not taught in the cited art and which have advantages not recognized therein. Accordingly, no prima facie case of obviousness has been established in accordance with the holding of *In Re Fine*. This lack of prima facie showing of obviousness means that the rejected claims are patentable under 35 USC 103 over Konopka in view of Taylor. It is, therefore, respectfully requested that the rejection of Claims 1, 2, 9-12, 14-17, 19-21 and 55-61 be reconsidered based on the novel and non-obvious exemplary claim language:

"An automated system for capturing and viewing an event having event participants, comprising: multiple cameras of different types simultaneously capturing images of sub-events occurring in a space associated with an event; **a virtual director that automatically determines which view of said multiple cameras of different types to display;** a server capable of recording and broadcasting the captured sub-events; and one or more clients in network connection with said server that view portions of the captured event." (emphasis added)

It is well settled, and defined in the MPEP, that to establish a *prima facie* case of obviousness, **the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make**

the claimed combination and a reasonable expectation of success must both be found in the prior art, and not based on Applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). See MPEP § 2143 - § 2143.03. The initial burden is on the examiner to provide some suggestion of the desirability of doing what the inventor has done. "To support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references." *Ex parte Clapp*, 227 USPQ 972, 973 (Bd. Pat. App. & Inter. 1985). See MPEP § 2144 - § 2144.09.

The applicants further contend that there is no motivation to combine the teachings of Taylor into Konopka. Specifically, Konopka discloses a video distance learning classroom that includes a rear audio/video cabinet housing four video monitors and a camera. The remote classrooms have front cabinets with four monitors and a camera. In a normal operating mode, one of the video monitors will display the teacher, while the other three monitors display classroom images. (Abstract) In Taylor image data captured from cameras around the periphery of the room (FIG. 1) is processed to determine the three-dimensional position and orientation of each person's head and to determine at whom each person is looking. The sound data is processed to determine the direction from which the sound came. Processing is carried out to determine who is speaking by determining which person has his head in a position corresponding to the direction from which the sound came. Image data to be archived is chosen by selecting the camera which best shows the speaking participant and the participant to whom he is speaking. (Abstract) But requiring Taylor's additional peripheral cameras around the room to determine which data to record in Konopka would be prohibitively expensive and needlessly increase the complexity of processing in Konopka. There would be no motivation to combine Konopka and Taylor.

In view of the lack of a prima facie case of obviousness the rejected claims are patentable under 35 USC 103 of Konopka in view of Taylor. It is, therefore,

respectfully requested that the rejection of Claims 1, 2, 9-12, 14-17, 19-21 and 55-61 be reconsidered.

The 35 USC 103 Rejection of 3, 5 and 6.

Claims 3, 5 and 6 were rejected under 35 USC 103(a) as being unpatentable over Konopka in view of Taylor and in further view of Ippolito, U.S. Patent No. 6,072,522 (herein after Ippolito). The Examiner stated that Konopka and Taylor teach the applicants' claimed invention, but do not cameras placed in back to back fashion. However, the Examiner further contended that Ippolito teaches this feature, rendering the applicants' claimed invention obvious. The applicants respectfully disagree with this contention of obviousness.

As discussed above, the applicants claim a Distributed Meeting (DM) system that provides high quality two-way conferencing and recording of meetings, as well as rich browsing of archived meetings enhanced through a number of analysis techniques. The system uses a variety of capture devices (360° omni-directional camera, whiteboard camera, presenter view camera, remote view camera, microphone devices and arrays and a graphics capture device) to give a rich experience to local and remote meeting participants. These capture devices are all synchronized to provide an integrated, scalable system and method for two-way conferencing, broadcasting, recording and viewing meetings or other events. The DM system and method can also include a virtual director module that automatically switches between the aforementioned cameras of different types to display a meeting-appropriate view of a speaker or other meeting data.

Neither Konopka nor Ippolito teach the applicant's claimed **multiple cameras of different types simultaneously capturing images of sub-events occurring in a space associated with an event; or a virtual director that determines which view of the multiple cameras of different types to display, and switches between the multiple cameras of different types to display a view of one of the different sub-events.**

Since neither Konopka nor Ippolito teach the applicant's claimed teach the applicant's claimed **multiple cameras of different types simultaneously capturing images of sub-events occurring in a space associated with an event; or a virtual director that determines which view of the multiple cameras of different types to display, and switches between the multiple cameras of different types to display a view of one of the different sub-events**, the combination does not teach it. Thus, the applicants have claimed elements not taught in the cited art and which have advantages not recognized therein. Accordingly, no prima facie case of obviousness has been established in accordance with the holding of *In Re Fine*. This lack of prima facie showing of obviousness means that the rejected claims are patentable under 35 USC 103 over Konopka in view of Ippolito. Additionally there is no motivation to combine Konopka and Taylor due to increased cost and complexity. It is, therefore, respectfully requested that the rejection of Claims 3, 5 and 6 be reconsidered based on the above quoted claim language.

The 35 USC 103 Rejection of 4.

Claim 4 was rejected under 35 USC 103(a) as being unpatentable over Konopka in view of Taylor, in view of Ippolito and in further view of Liu et al., U.S. Patent No. 6,839,067 (herein after Liu). The Examiner stated that Konopka, Ippolito and Taylor teach the applicants' claimed invention, but do not teach a panoramic stitcher for stitching images together. However, the Examiner further contended that Liu teaches this feature, rendering the applicants' claimed invention obvious. The applicants respectfully disagree with this contention of obviousness.

As discussed above, the applicants claim a Distributed Meeting (DM) system that provides high quality two-way conferencing and recording of meetings, as well as rich browsing of archived meetings enhanced through a number of analysis techniques. The system uses a variety of capture devices (360° omni-directional camera, whiteboard camera, presenter view camera, remote view camera, microphone devices and arrays and a graphics capture device) to give a rich experience to local and remote meeting participants. These capture devices are all

synchronized to provide an integrated, scalable system and method for two-way conferencing, broadcasting, recording and viewing meetings or other events. The DM system and method can also include a virtual director module that automatically switches between the aforementioned cameras of different types to display a meeting-appropriate view of a speaker or other meeting data.

As discussed above neither Konopka nor Taylor nor Ippolito teach the applicant's claimed **multiple cameras of different types simultaneously capturing images of sub-events occurring in a space associated with an event; or a virtual director that determines which view of the multiple cameras of different types to display, and switches between the multiple cameras of different types to display a view of one of the different sub-events.**

Liu teaches a method and apparatus for providing multi-resolution video to multiple users under hybrid human and automatic control. Initial environment and close-up images are captured using a first camera and a PTZ camera. The initial images are then stored in memory. Current environment and close-up images are captured and then an estimated difference between the initial and current images and the true image is determined. The estimated differences are weighted and compared and the stored images are updated. A close-up image is then provided to each user of the system. The close-up camera is then directed to a portion of the environment image having high distortion, and current environment and close-up images are captured again. (Abstract) However, Liu does not teach the applicant's claimed **multiple cameras of different types simultaneously capturing images of sub-events occurring in a space associated with an event; or a virtual director that determines which view of the multiple cameras of different types to display, and switches between the multiple cameras of different types to display a view of one of the different sub-events.**

Since neither Konopka nor Taylor nor Ippolito nor Liu teaches the applicant's claimed teach the applicant's claimed **multiple cameras of different types simultaneously capturing images of sub-events occurring in a space**

associated with an event where a virtual director automatically determines which view of the multiple cameras of different types to display, and switches between the multiple cameras of different types to display a view of one of the different sub-events, the combination does not teach it. Thus, the applicants have claimed elements not taught in the cited art and which have advantages not recognized therein. Accordingly, no prima facie case of obviousness has been established in accordance with the holding of *In Re Fine*. This lack of prima facie showing of obviousness means that the rejected claims are patentable under 35 USC 103 over Konopka in view of Ippolito and Taylor and Liu. Additionally, as discussed above there is no motivation to combine Konopka and Taylor due to increased cost and complexity. It is, therefore, respectfully requested that the rejection of Claim 4 be reconsidered based on the above quoted claim language.

The 35 USC 103 Rejection of 8.

Claim 8 was rejected under 35 USC 103(a) as being unpatentable over Konopka in view of Taylor, in view of Ippolito and in further view of Liu. The Examiner stated that Konopka, Ippolito and Taylor teach the applicants' claimed invention, but do not teach displaying a higher resolution image of a presenter. However, the Examiner further contended that Liu teaches this feature, rendering the applicants' claimed invention obvious. The applicants respectfully disagree with this contention of obviousness.

As discussed above, the applicants claim a Distributed Meeting (DM) system that provides high quality two-way conferencing and recording of meetings, as well as rich browsing of archived meetings enhanced through a number of analysis techniques. The system uses a variety of capture devices (360° omni-directional camera, whiteboard camera, presenter view camera, remote view camera, microphone devices and arrays and a graphics capture device) to give a rich experience to local and remote meeting participants. These capture devices are all synchronized to provide an integrated, scalable system and method for two-way conferencing, broadcasting, recording and viewing meetings or other events. The DM system and method can also include a virtual director module that automatically

switches between the aforementioned cameras of different types to display a meeting-appropriate view of a speaker or other meeting data.

As discussed above neither Konopka nor Taylor nor Ippolito teach the applicant's claimed **multiple cameras of different types simultaneously capturing images of sub-events occurring in a space associated with an event; or a virtual director that determines which view of the multiple cameras of different types to display, and switches between the multiple cameras of different types to display a view of one of the different sub-events.**

Liu teaches a method and apparatus for providing multi-resolution video to multiple users under hybrid human and automatic control. Initial environment and close-up images are captured using a first camera and a PTZ camera. The initial images are then stored in memory. Current environment and close-up images are captured and then an estimated difference between the initial and current images and the true image is determined. The estimated differences are weighted and compared and the stored images are updated. A close-up image is then provided to each user of the system. The close-up camera is then directed to a portion of the environment image having high distortion, and current environment and close-up images are captured again. (Abstract) However, Liu does not teach the applicant's claimed **multiple cameras of different types simultaneously capturing images of sub-events occurring in a space associated with an event; or a virtual director that determines which view of the multiple cameras of different types to display, and switches between the multiple cameras of different types to display a view of one of the different sub-events.**

Since neither Konopka nor Taylor nor Ippolito nor Liu teaches the applicant's claimed teach the applicant's claimed **multiple cameras of different types simultaneously capturing images of sub-events occurring in a space associated with an event where a virtual director automatically determines which view of the multiple cameras of different types to display, and switches between the multiple cameras of different types to display a view of one of the**

different sub-events, the combination does not teach it. Thus, the applicants have claimed elements not taught in the cited art and which have advantages not recognized therein. Accordingly, no prima facie case of obviousness has been established in accordance with the holding of *In Re Fine*. This lack of prima facie showing of obviousness means that the rejected claims are patentable under 35 USC 103 over Konopka in view of Ippolito and Taylor and Liu. Additionally, as discussed above there is no motivation to combine Konopka and Taylor due to increased cost and complexity. It is, therefore, respectfully requested that the rejection of Claim 8 be reconsidered based on the above quoted claim language.

The 35 USC 103 Rejection of Claim 13.

Claim 13 was rejected under 35 USC 103(a) as being unpatentable over Konopka in view of Taylor and in further view of Rodriguez, Jr. et al., U.S. Patent No. 6,179,426 (herein after Rodriguez). The Examiner stated that Konopka and Taylor teach the applicants' claimed invention, but do not teach a projector for projecting images on a screen. However, the Examiner further contended that Rodriguez teaches this feature, rendering the applicants' claimed invention obvious. The applicants respectfully disagree with this contention of obviousness.

As discussed above neither Konopka nor Taylor teach the applicant's claimed **multiple cameras of different types simultaneously capturing images of sub-events occurring in a space associated with an event where a virtual director automatically determines which of the multiple cameras of different types to display, and switches between the multiple cameras of different types to display a view of one of the different sub-events. Rodriguez also does not teach these claimed features.**

Since neither Konopka nor Taylor nor Rodriguez teaches the applicant's claimed **multiple cameras of different types simultaneously capturing images of sub-events occurring in a space associated with an event; or a virtual director that determines which view of the multiple cameras of different types**

to display, and switches between the multiple cameras of different types to display a view of one of the different sub-events, the combination does not teach it. Thus, the applicants have claimed elements not taught in the cited art and which have advantages not recognized therein. Accordingly, no prima facie case of obviousness has been established in accordance with the holding of *In Re Fine*. Additionally, there is no motivation to combine Konopka with Taylor because this combination, as discussed above. This lack of prima facie showing of obviousness means that the rejected claims are patentable under 35 USC 103 over Konopka in view of Taylor and Rodriguez. It is, therefore, respectfully requested that the rejection of Claim 13 be reconsidered based on the above quoted claim language.

The 35 USC 103 Rejection of Claims 51-54.

Claims 51-54 were rejected under 35 USC 103(a) as being unpatentable over Konopka in view of Taylor in view of Ippolito and in further view of Rodriguez, Jr. et al., U.S. Patent No. 6,179,426 (herein after Rodriguez). The Examiner stated that Konopka, Taylor and Ippolito teach the applicants' claimed invention, but do not teach the same types of cameras, in particular a whiteboard camera. However, the Examiner further contended that Rodriguez teaches this feature, rendering the applicants' claimed invention obvious. The applicants respectfully disagree with this contention of obviousness.

As discussed above neither Konopka nor Taylor nor Ippolito teach the applicant's claimed **multiple cameras of different types simultaneously capturing images of sub-events occurring in a space associated with an event where a virtual director determines which of the multiple cameras of different types to display, and switches between the multiple cameras of different types to display a view of one of the different sub-events.** Rodriguez also does not **teach these claimed features.**

Since neither Konopka nor Taylor nor Ippolito nor Rodriguez teaches the applicant's claimed **multiple cameras of different types simultaneously capturing images of sub-events occurring in a space associated with an event**

with a virtual director that automatically determines which of the multiple cameras of different types to display, and switches between the multiple cameras of different types to display a view of one of the different sub-events, the combination does not teach it. Thus, the applicants have claimed elements not taught in the cited art and which have advantages not recognized therein. Accordingly, no prima facie case of obviousness has been established in accordance with the holding of *In Re Fine*. Additionally, there is no motivation to combine Konopka with Taylor because this combination, as discussed above. This lack of prima facie showing of obviousness means that the rejected claims are patentable under 35 USC 103 over Konopka in view of Taylor, Ippolito and Rodriguez. It is, therefore, respectfully requested that the rejection of Claims 51-54 be reconsidered based on the above quoted claim language.

The 35 USC 103 Rejection of Claim 18.

Claim 18 was rejected under 35 USC 103(a) as being unpatentable over Konopka in view of Taylor and in further view of Tosaya, U.S. Patent No. 6,549,230 (herein after Tosaya). The Examiner stated that Konopka and Taylor teach the applicants' claimed invention, but do not teach an event kiosk that is located on one of multiple cameras. However, the Examiner further contended that Tosaya teaches this feature, rendering the applicants' claimed invention obvious. The applicants respectfully disagree with this contention of obviousness.

As discussed above neither Konopka nor Taylor teach the applicant's claimed **multiple cameras of different types simultaneously capturing images of sub-events occurring in a space associated with an event where a virtual director determines which of the multiple cameras of different types to display, and switches between the multiple cameras of different types to display a view of one of the different sub-events. Tosaya also does not teach these claimed features.**

Since neither Konopka nor Taylor nor Tosaya teaches the applicant's claimed As discussed above neither Konopka nor Taylor teach the applicant's

claimed **multiple cameras of different types simultaneously capturing images of sub-events occurring in a space associated with an event where a virtual director determines which of the multiple cameras of different types to display, and switches between the multiple cameras of different types to display a view of one of the different sub-events**, the combination does not teach it. Thus, the applicants have claimed elements not taught in the cited art and which have advantages not recognized therein. Accordingly, no prima facie case of obviousness has been established in accordance with the holding of *In Re Fine*. Additionally, there is no motivation to combine Konopka with Taylor because this combination, as discussed above. This lack of prima facie showing of obviousness means that the rejected claims are patentable under 35 USC 103 over Konopka in view of Taylor and Tosaya. It is, therefore, respectfully requested that the rejection of Claim 18 be reconsidered based on the above quoted claim language.

The 35 USC 103 Rejection of Claims 69, 71 and 72

Claims 69, 71 and 72 were rejected under 35 USC 103(a) as being unpatentable over Konopka, in view of Taylor, in view of Ippolito and in view of Rodriguez in further view of Tosaya. The Examiner stated that Konopka, Taylor, Ippolito and Rodriguez teach the applicants' claimed invention, but do not teach a 360-degree camera that includes an integrated computer that performs processing required to broadcast images and associated meeting data. However, the Examiner further contended that Tosaya teaches this feature, rendering the applicants' claimed invention obvious. The applicants respectfully disagree with this contention of obviousness.

As discussed above neither Konopka nor Taylor nor Ippolito nor Rodriguez teach the applicant's claimed **multiple cameras of different types simultaneously capturing images of sub-events occurring in a space associated with an event where a virtual director automatically determines which of the multiple cameras of different types to display, and switches between the multiple cameras of different types to display a view of one of the different sub-events**. **Rodriguez also does not teach these claimed features.**


Tosaya teaches a portable video conference module supporting a network-based video conference comprising a processor, a video camera, and audio input device and several interfaces coupled to the processor. The processor includes a local instruction processor accessing a local non-volatile memory. The interfaces include a wireless data capture interface, a video display interface, an audio output interface and a network interface. But Tosaya does not teach the applicants' claimed **multiple cameras of different types simultaneously capturing images of sub-events occurring in a space associated with an event where a virtual director automatically determines which of the multiple cameras of different types to display, and switches between the multiple cameras of different types to display a view of one of the different sub-events.** Tosaya also does not teach **these claimed features.**

Since neither Konopka nor Taylor nor Ippolito nor Tosaya teaches the applicant's claimed **multiple cameras of different types simultaneously capturing images of sub-events occurring in a space associated with an event where a virtual director automatically determines which of the multiple cameras of different types to display, and switches between the multiple cameras of different types to display a view of one of the different sub-events,** the combination does not teach it. Thus, the applicants have claimed elements not taught in the cited art and which have advantages not recognized therein. Accordingly, no prima facie case of obviousness has been established in accordance with the holding of *In Re Fine*. This lack of prima facie showing of obviousness means that the rejected claims are patentable under 35 USC 103 over Konopka, Taylor, Ippolito and Rodriguez, in view of Tosaya. It is, therefore, respectfully requested that the rejection of Claims 69, 71 and 72 be reconsidered based on the above quoted claim language.

In summary, it is believed that the claims 1-6, 8-21, 51-61 and 69, 71-72 are in condition for allowance. Allowance of these claims at an early date is courteously solicited.

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